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March 24, 2016

By Electronic Filing

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

Re: *Commodities & Minerals Enterprise Ltd. v. CVG Ferrominera Orinoco, C.A.*
Case No. 16-cv-000861 (ALC)(HBP)

Dear Judge Carter:

This law firm is in the process of being retained by Defendant CVG Ferrominera Orinoco, C.A. ("FMO") and we write on its behalf.

The parties have agreed to extend Defendant's deadline to respond to the complaint and raise any challenges to the attachment motions from March 28, 2016 to April 29, 2016.

This is Defendant's second extension of time.

Respectfully submitted,

A handwritten signature in blue ink, which appears to read "Eliyahu Z. Kaploun".

Eliyahu Z. Kaploun

Cc by email: Michael Frevola